



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JAN 17 2008

Mr. Glenn Savary, Case Manager  
New Jersey Department of Environmental Protection  
Bureau of Case Management  
CN 028  
Trenton, NJ 08625

RE: Remedial Action Selection Report for MW19/Hot Spot 1 Area, dated September 2007  
Dayco Corporation/LE Carpenter Company Superfund Site, Wharton, New Jersey

Mr. Savary:

The United States Environmental Protection Agency (EPA) has reviewed the above-referenced document and offers the following comments:

1. Page 2-3, 2<sup>nd</sup> Paragraph: The brief discussion of a "smear zone" at the top of the water table mentions an apparent secondary source that continues to provide contaminant mass to the aquifer. This is plausible, and any remedial action taken should address mitigation both above and below the "fluctuating" water table.
2. Section 4: EPA concurs with the recommended remedial action, which includes excavation, in-situ chemical oxidation, and installation of a permeable media layer. The full nature and extent of the source area should be determined so that the remedial action is optimal.
3. Tables: Well locations should have assigned NJDEP well numbers cross referenced on a table with local monitoring well designations and all locational and elevation survey data.
4. Figure 2: This figure shows the site plan and MW19/Hot Spot 1 Area locations, and was originally prepared by RMT as a CADD drawing. It references the revised topographic survey by James M. Stewart, Inc. In accordance with EPA Region 2's Electronic Database Deliverables (EDD) guidance, please provide an electronic copy of the actual drawing file of the site showing the location of the full monitoring well network. The format for submittal to EPA of the site and locational data is provided through the following link: <http://www.epa.gov/region02/superfund/medd.htm>, which provides links to the instruction manuals, templates and electronic data checker. Note that the "site" and "location" EDD files are basically 1-time submittals as discussed in the Basic Manual for Electronic Data.

281841



Internet Address (URL) • <http://www.epa.gov>

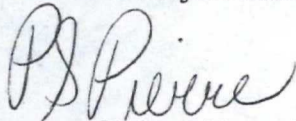
Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

5. Appendix C: The boring logs for the August 2007 soils borings do not have either elevation or locational data. The use of an "approximate" ground surface in preparation of the cross-sections is not sound, although it has only insignificant bearing on the overall results of the soil sampling and delineation of impacted area. It is crucial to obtain accurate elevation and locational data as the hydraulic gradient in this area is very "flat" and there is an increasing probability of not effectively treating or monitoring the impacted groundwater and direction which the source appears to have already penetrated.
6. Appendix E: The slug test data is questionable and there appear to be erroneous assumptions in the well data and parameters, (i.e., the thickness of the aquifer and the total well penetration depths should be clarified).

If you have any questions or require further clarification on the above comments, please do not hesitate to contact me at 212-637-3865 or at [pierre.patricia@epa.gov](mailto:pierre.patricia@epa.gov).

Sincerely yours,

Patricia Simmons Pierre  
Remedial Project Manager



cc: Robert Alvey, EPA